

EXHIBIT 6

**This document has been redacted pursuant
to Your Honor's Individual Practices 11**

EXPERT REPORT OF MIKE ROTHSCILD

Jack and Leslie Flynn v. Cable News Network, Inc. (S.D.N.Y., No. 1:21-cv-02587)

JUNE 5, 2023

I. OVERVIEW

I have been retained to provide an expert analysis in the following matters: *Jack and Leslie Flynn v. Cable News Network, Inc.* (S.D.N.Y., No. 1:21-cv-02587); *Lori Flynn v. Cable News Network, Inc.* (M.D. Fla., No. 8:22-cv-00512); and *Valerie Flynn v. Cable News Network, Inc.* (M.D. Fla., No. 8:22-cv-00343). I was asked to examine the Flynn family's public and private support of the QAnon conspiracy theory, to explain the origin and growth of QAnon, and how the Q movement is connected to General Michael Flynn. In particular, I was asked to analyze exactly how the phrase the Flynn's used during their "take the oath" video of July 4, 2020, "Where We Go One, We Go All," is a critical and unique part of the branding and iconography of QAnon – and is a phrase almost exclusively used by believers in QAnon.

A. Qualifications

I am a journalist who has spent the last decade writing about the mainstreaming of conspiracy theories and fringe culture. Most recently, I have focused my research and writing on the QAnon conspiracy theory, becoming one of the first journalists to examine its growth from message board posts to an international movement with real-world consequences.

I am the author of hundreds of articles about QAnon, culminating in the book *The Storm is Upon Us: How QAnon Became a Movement, Cult, and Conspiracy Theory of Everything*, published by Melville House in 2021. This was the first book to examine the QAnon movement from its predecessor scams and anti-Semitic tropes, through its expansion on the internet, and up until the aftermath of the January 6, 2021 insurrection. I have appeared on CNN, MSNBC, NPR, PBS, and the BBC. I have also been interviewed or had my book featured by the *Washington Post*, *The New York Times*, *NBC News*, *Vice*, *The Guardian*, *The New Yorker*, *Rolling Stone*, *The Daily Beast*, *The Financial Times*, *Politico*, *Bloomberg*, *Forbes*, and many others. A complete list of publications I have authored in the previous ten years is attached as Exhibit A, and a copy of my resume is attached as Exhibit B.

I gave written testimony to the January 6th Select Committee on the role of QAnon in the stolen election discourse on March 23, 2022; testified in person to the House Committee on Administration about the threat of election misinformation on June 22, 2022; spoke on a panel on QAnon at the ADL's annual "Never is Now" conference on November 8, 2022; and delivered a keynote speech at the Center For Jewish Civilization's conference "120 Years of the *Protocols of the Elders of Zion*" on April 24, 2023.

B. Prior Expert Testimony

As an expert witness, I have provided written expert reports in the following additional cases in the last four years:

- *Eric Coomer, Ph.D. vs. Donald Trump for President, et al.* (Denver Cty District Court, Colorado No. 2020-cv-034319): Provided written report on the links between QAnon and defendants Donald Trump for President, Rudy Giuliani, Joe Oltmann, Chanel Rion, One America News Network, Eric Metaxas, and Jim Hoft in defamation case brought by former Dominion Voting Systems executive Eric Coomer in 2021 – qualified as an expert by court (May 13, 2022).
- *Eric Coomer, Ph. D. vs. Make Your Life Epic LLC dba ThriveTime Show, and Clay Clark* (D. Colo. No. 1:21-cv-3440): Provided written report on the links between QAnon and the ReAwaken America tour, its individual speakers (including General Michael Flynn), and its founder Clay Clark, in defamation case brought by former Dominion Voting Systems executive Eric Coomer in 2021 – qualified as an expert by court (March 7, 2023).
- *Eric Coomer, Ph. D. vs. Patrick Byrne, Steven Lucescu, and The America Project, Inc.* (D. Colo. No. 1:22-cv-1575): Provided written report on the links between QAnon and the team behind the “stolen election” film *The Deep Rig* (which featured General Flynn), in defamation case brought by former Dominion Voting Systems executive Eric Coomer in 2022.
- *Jessica Herold vs. Jon Herold*, (South Central District Court, North Dakota No. 08-2021-DM-00617): Provided written report on links between QAnon and the “devolution” conspiracy theory for divorce case involving right-wing social media influencer Jon Herold, who created and monetized the theory.

C. Compensation

I am being compensated for my time at the rate of \$600 per hour. My rate for deposition or trial testimony will be \$800 per hour.

D. Facts and Data Considered

The documents and materials I have considered for this report include:

- My 2021 book *The Storm is Upon Us: How QAnon Became a Movement, Cult, and Conspiracy Theory of Everything* (Melville House), and all related interviews and archival material
- My previous written articles and interviews related to QAnon
- All deposition transcripts in this matter
- All relevant social media and archives of deleted posts in this action
- Operative Amended Complaints in each of the three actions
- All news articles cited within this Expert Report
- All exhibits cited within this Expert Report

I also reserve the right to supplement this report with additional material should it become available.

II. SUMMARY OF OPINIONS

I understand that in this SDNY Action, Jack and Leslie Flynn allege they were placed in a false light by a CNN report that labeled them “QAnon followers.” I do not think the report labels them as QAnon followers. But in my expert opinion, it would be reasonable for any news organization, including CNN, to conclude that Jack and Leslie Flynn were either signifying that they were QAnon followers or were comfortable being associated with QAnon, when they stood next to General Michael Flynn as he repeated the QAnon mantra “Where We Go One, We Go All.”

I conclude this based on numerous factors, which include:

1. Standard journalistic practice of describing anyone who shares QAnon material or catchphrases as a follower or believer in the conspiracy movement – even if “belief” is a concept that cannot be quantitatively measured;
2. Many Q followers simultaneously use Q catchphrases and iconography while also denying they know anything about Q or actively claiming Q is fake – including Jack’s brother General Michael Flynn, family lawyer Sidney Powell, and QAnon podcaster Jeffrey Pedersen, a figure who has hosted members of the Flynn family on his show several times, and who distanced himself from QAnon in a motion to quash his subpoena, only to withdraw his motion and testify extensively about his links to Q;
3. The phrase “Where We Go One, We Go All” has virtually no other recent popular usage than in the QAnon movement, despite Jack and Leslie Flynn’s Amended Complaint attempting to offer multiple other explanations for where the phrase originates;
4. The timing of the “oath” taken by the Flynn family, and how it quickly followed a Q drop on the image board 8kun that used the exact same phraseology – and how it was quickly adopted by both the QAnon movement in general and General Flynn in particular;
5. Widespread reporting on the Oath as taken by the Flynnns, including Jack and Leslie, that called it a QAnon oath, and the Flynn family’s failure to remove it from their social media when media outlets called it a QAnon-linked statement, which shows, at a minimum, that Jack Flynn was comfortable with the association;
6. Jack Flynn’s numerous tweets that demonstrated his knowledge and approval of QAnon, including tweets saying there is “nothing wrong with QAnon” and that QAnon is “civilized [and] encouraging people to learn independently” – a stark contrast with the claims he would later make in his Amended Complaint that QAnon is equivalent to a Nazi cult and the terror group ISIS;
7. Leslie Flynn’s familiarity with “Where We Go One, We Go All” and her willingness to appear in the July Fourth Video; and
8. General Flynn and his family’s involvement with and monetization of the QAnon movement, including selling Q-branded merchandise, speaking at QAnon conferences, and using QAnon catchphrases in his social media statements to support General Flynn’s Legal Defense Fund.

III. BACKGROUND ON JULY FOURTH OATH VIDEO

On July 4, 2020, General Flynn and members of his family, including Jack and Leslie Flynn, participated in the making of a video based on the trend among believers in the QAnon conspiracy theory to “take the oath,” which was inspired by a Q drop. In the video, General Flynn leads his family, including the plaintiffs, in reciting the oath of office taken by newly enlisted members of the military along with federal elected officeholders.

When the oath was completed, General Flynn shouted the QAnon slogan “Where We Go One, We Go All” which the other family members, including plaintiffs, subsequently repeated. This oath, which I will call the July Fourth Oath, is identical to a Q drop as discussed below. After the July Fourth Oath, the Flynn family then repeated the same sequence for the phrase “God Bless America.” [REDACTED]

[REDACTED] before General Flynn and multiple members of his family, including Jack Flynn, quickly shared the video clip of “the oath” on Twitter, where it went viral among General Flynn’s followers, and received hundreds of thousands of views and shares; including multiple retweets, shares, and likes on Twitter by Jack Flynn.

In February 2021, more than seven months later, CNN aired a report, called “Watch CNN Go Inside a Gathering of QAnon Followers,” that reported on a small convention of QAnon believers called “Q Con Live!” held in Scottsdale, Arizona in October 2020, which featured several prominent figures in the QAnon world including QAnon podcaster Jeffrey Pedersen, who creates content as “InTheMatrixxx,” 8chan owner Jim Watkins, the “Q Shaman,” and QAnon musician JT Wilde. In the Report, after JT Wilde sings “Where We Go One, We Go All,” the QAnon slogan, CNN reporter Donie O’Sullivan says “‘Where We Go One, We Go All,’ an infamous QAnon slogan promoted by Trump’s first national security advisor, Michael Flynn.” Immediately after he speaks these words, there is a clip of the July Fourth Oath that shows General Flynn – and only General Flynn – saying “Where We Go One, We Go All,” as Jack and Leslie Flynn stand wordless next to him, with their right hands raised.

Other than a reference to General Flynn’s use of QAnon slogans like “Where We Go One, We Go All,” the segment is entirely about the growth and spread of the QAnon conspiracy theory and in its belief by many arrested Capitol rioters. It is not about Jack and Leslie Flynn, it does not name Jack and Leslie Flynn, and they do not speak in the video.

IV. THE BASICS OF QANON

The movement known as “QAnon” is elastic and difficult to define. Not all QAnon believers approach it in the same way. Many believe in some of the central tenets of QAnon – the idea of an all-powerful secret government that controls world events, the 2020 election being stolen by Joe Biden, COVID-19 being a bioweapon and the vaccine a tool for depopulation – without believing in the more outrageous aspects of the theory, such as that the world is run by a Deep State cabal of pedophiles, and that John F. Kennedy Jr. is still alive. [REDACTED]

[REDACTED]

QAnon, then, is not a coherent belief system. It does not present itself as a religion, a political movement, or a traditional cult that requires lockstep agreement with the leader. Instead, it has aspects of all three, and those aspects have come to be the driving force of American conservative politics in the post-Trump era.

The movement began in late October 2017, with anonymous posts on the image board 4chan. The posts were made by someone who first called themselves “Q Clearance Patriot” after the Department of Energy classification for having access to information related to nuclear power, then just “Q.” The first Q “drops,” the name for these cryptic messages, claimed that Donald Trump would soon be initiating a top-secret military operation to purge America of its domestic enemies, involving military assets, martial law, and possibly a large-scale blackout of the internet.

In their first post, Q claimed that Hillary Clinton’s passport was being flagged as she attempted to flee the country, which would lead to her arrest alongside members of her inner circle. The news of her “extradition” would trigger a vast unsealing of secret indictments against the Democratic Party, Barack Obama, George Soros, and hundreds of other elites in banking, the entertainment industry, and the mainstream media. Q said the arrest would be quickly followed by a series of field tribunals, and executions of the “guilty” – all carried out by armed forces personnel acting under the orders of military intelligence. What would follow would be a new utopia of peace and freedom, made possible by Donald Trump, the greatest strategic thinker and tactician the world had ever seen.

Despite no evidence that any of this was real, and no reason why a “military intelligence team” would use a board as chaotic and racist as 4chan to leak classified information, Q’s story immediately picked up steam.

Within just a few days, a small cadre of acolytes began to add their own interpretations to Q’s posts on 4chan, Reddit, and in YouTube videos. One of these early Q influencers was Tracy “Beanz” Diaz, a figure who would go on to work with General Michael Flynn on multiple business ventures – while simultaneously saying she has nothing to do with QAnon. Throughout November 2017, Q added more and more details to what was going to happen in the upcoming “Storm,” such as the use of the Emergency Alert System to notify patriots, military personnel called up to crush leftist riots, various blackouts and internet outages carried out in retaliation, and a general sense of chaos. “The Storm” was timed to coincide with what some conspiracy believers thought would be an “antifa uprising” on November 4, 2017 – which Q claimed was going to result in nationwide martial law.

¹ [REDACTED]

But neither the “uprising” nor the mass arrests took place, and by mid-November 2017, Q’s initial story fizzled out. Cultic movements are, however, remarkably resistant to disconfirmation or being proven wrong. And Q had already found both a fan base willing to rationalize the failure of Q’s prophecies and a growing web of influencers making money off it. Q moved forward, creating a complex story based around a vast silent, fictional, secret war between the forces of good and evil taking place on a countless number of fronts and involving an incomprehensible array of people and events.

The home of Q’s drops changed on November 25, 2017, when the poster moved from 4chan to another imageboard called 8chan. 8chan was renowned for its “shock” content, and in June 2019, 8chan lost its web security hosts after the site was used to post hate-filled manifestos by multiple mass shooters. It was quickly hacked and went silent, only to be rebuilt by its owner Jim Watkins as “8kun” and relaunched in November 2019. Even before the site was publicly available to post on, Q began making drops on the board, and the Q story continued.

As time went on, Q also provided ways for believers to participate in the story through decoding the posts, making memes to share on social media, and adding their own elements to what Q was spinning out. The sharing of memes is critical in QAnon for both spreading Q’s theories and for turning on potential new converts. Q drops frequently spoke of the importance of having “memes at the ready”² and many of them used familiar catchphrases like “Digital Soldiers” and “Where We Go One, We Go All.” This elastic and malleable version of QAnon – a cryptic and rhetorical prophecy movement based around imminent mass arrests of the Deep State, with individual details added or removed according to each believer’s personal interests – persisted through countless failures of its core predictions to come true.

Nothing Q claimed would come to pass ever took place, and the Q poster themselves even disclaimed some of the more fanciful elements of the theory that the media routinely mocked, such as John F. Kennedy Jr. still being alive. Through it all, there was never any evidence that a military intelligence team was making the posts or that Trump was involved at all. But Q drops kept coming until shortly after Trump lost the 2020 election, except for a brief and mostly impact-less return in 2022.³

Q is based on certain real ideas, such as the existence of Q Clearance, but loads them down with fantasy and wishful thinking. It has both cultish and occult aspects, but also deviates from traditional cultic movements. And those who read and decoded Q’s posts included a broad range of Americans – Trump die-hards, conservatives, and college-educated, coastal professionals from both parties, along with progressive-leaning moms, New Age devotees, vaccine skeptics, and alternative medicine users during the isolation of the COVID-19 pandemic.

The mysterious “Q” who made the posts has never been identified with 100% certainty. A stylometric analysis of writing styles identified that, instead of the high-ranking US government

² Ex. 36 (<https://qposts.online/post/2147>).

³ Many Q believers discarded the 2022 drops as being “fake,” in keeping with how Q believers do not all believe the same aspects of QAnon, such as John F. Kennedy Jr. still being alive or “adrenochrome” being a super drug of the elite. Indeed, neither of these concepts are ever mentioned in a Q drop, yet both are believed by at least some Q followers.

official he claimed to be, Paul Furber, a South African web programmer was the likely originator of Q drops on 4chan, with 8chan administrator Ron Watkins likely writing the bulk of those that came after Q's first few months. Watkins, known as "CodeMonkeyZ" on social media, would later become an influencer in the "stolen election" conspiracy theory and was interviewed by multiple news outlets regarding his "expertise" in hacking Dominion Voting Systems machines – expertise he did not actually have.

Both Ron and his father Jim Watkins are familiar faces in the conspiracy theory community around Q, and were also involved in the January 6 insurrection. Jim Watkins was also an attendee at the "Q Con Live!" event that formed the basis of CNN's report.⁴

Q's message of utopia through extrajudicial oppression of "enemies" gave believers hope, and let them in on secret knowledge that "they" did not want anyone to have. And an ecosystem of Q promoters and far right figures ruthlessly took advantage of their belief. Many influential figures in Trump's orbit, such as Roger Stone, Alex Jones, Sidney Powell, Mike Lindell, and Rudy Giuliani have all either endorsed QAnon or paid lip service to it to raise money for General Flynn's Legal Defense Fund.

But there may be no figure who bridges the gap between Trump and Q more than General Michael Flynn, Trump's former National Security Advisor. For several years, General Flynn has spoken at Q and conspiracy-themed conferences, sold QAnon merchandise, worked with QAnon influencers, and used variations on Q iconography in his other writings and speeches. During these statements, General Flynn often spoke about how he and his "family," [REDACTED], were grateful for the support of his Legal Defense Fund, which was evangelized by Jack Flynn at every opportunity. Separating QAnon from the Flynn family has become nearly impossible, and if individual Flynn family members do not "believe" Q is real, they seem to have no issue with the money that Q has made them.

[REDACTED]

V. WHAT DOES IT MEAN TO BE A "QANON FOLLOWER?"

There is no definition for what a QAnon follower is, or what "following" QAnon actually entails. But it can take many forms, none of which require a person to declare "I am a QAnon

⁴ David Kirkpatrick, *Who Is Behind QAnon? Linguistic Detectives Find Fingerprints*, N.Y. TIMES (Feb. 19, 2022),

h [REDACTED]

follower.” It can involve sharing QAnon slogans and memes, but it does not have to. And while many Q believers were actively involved in reading and decoding Q’s “drops,” there have not been any since December 2020 (other than a few in 2022), so that cannot be used as a yardstick to gauge fervency. Instead, one must look at what those who support Q say in public, and how they say it.

The court concluded that “a QAnon follower is an adherent to the QAnon belief system—including the belief that a high-ranking government insider known as ‘Q’ is exposing a cabal of Satan-worshipping pedophiles which controls the government—not merely someone who read or forwarded tweets about QAnon.”⁶

But this is incorrect because of the nature of how QAnon works. It is a multi-faceted conspiracy movement, not simply about pedophiles in the government, but about a shared language and values system – a system that Jack and Leslie Flynn have both publicly showed their support for and knowledge of. The “Satan-worshipping pedophiles” aspect of Q is not required to be a Q believer, and many prominent figures in the Q movement rarely or never mention it. Other believers simply speak of a shadowy cabal of power-brokers working to keep President Trump from succeeding and to keep hard-working Americans loaded down with debt while enacting unacceptable social changes. Still others claim the ideas that JFK Jr. is alive or that the Deep State harvests “Adrenochrome” from frightened children are fake because they do not appear in Q drops. These are people drawn much more to the sense of community and a shared belief in President Trump than in any kind of secret guru.

The court also concluded that that “none of the Flynn’s tweets state that they are believers in the QAnon movement,” and therefore, the tweets and retweets they made featuring QAnon slogans should not be considered endorsements of QAnon.⁷ With respect, this is a misunderstanding of how belief in QAnon works. Q supporters rarely, if ever, come out and say “I believe in QAnon.” Most do not even use the term “QAnon,” erroneously claiming it to be a phrase coined by the “Deep State” media to make Q believers look mentally ill.⁸

Instead of outright declaring their beliefs, those who follow the Q movement use other signifiers. They use the catchphrases used in Q drops – pat statements like “watch the water” or “you have more than you know.” They wear clothing with Q logos on it. They often customize and spread their own versions of the movement, since not every Q believer thinks every aspect of QAnon is true.⁹

⁶ ECF No. 38.

⁷ Bernie Pazanowski, “Court Rejects CNN Defense That QAnon Retweets Are Endorsements,” BLOOMBERG LAW (Aug. 12, 2022), <https://news.bloomberglaw.com/us-law-week/court-rejects-cnn-defense-that-qanon-retweets-are-endorsements>.

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⁹ One also does not have to actually read Q drops on 4chan or 8chan/8kun to be a Q believer, as many Q adherents speak of reading drops on either Twitter or through aggregator sites that post the text of drops.

Using a Q term or meme in public shows others that you approve of QAnon, and you want people to know that. That is exactly what Jack and Leslie Flynn did with their video using the phrase “Where We Go One, We Go All” In the Fourth of July Video.

Ultimately, belief in QAnon, like any religious or mass movement, lies in the heart of the individual. It is impossible to truly know if a person who uses the iconography of QAnon actually believes that “Q” was an actual military intelligence operation, just as it is impossible to truly know if a person who attends church every Sunday *actually* believes in God. All we have to go on to measure belief are what a person does and what they put out to the world.

In my experience reading the posts and seeing the videos of thousands of Q believers, if a person acts and speaks as if they believe QAnon is real, then there is no reason to think anything other than they are comfortable being associated with QAnon. This is the public stance Jack Flynn took toward QAnon on social media: it was never full-throated endorsement, or a statement of “I believe QAnon is real.” But Jack frequently associated himself with Q, including the easy use of QAnon catchphrases, and posting his video using #TakeTheOath. And Leslie liked posts on Twitter with the words “Where We Go One, We Go All.”

Using these standards, journalists and researchers routinely write that anyone who shares the branding, hashtags, catchphrases, or concepts directly developed by QAnon is a *believer*. The words *follower*, *adherent*, *believer*, *acolyte*, *anon*, or *supporter* can also be used; or a person who has used Q iconography can be described as having *endorsed*, *given credence*, *embraced* or been *Q-pilled*.

For example, in both 2020 and 2022, the left-leaning watchdog group Media Matters organization kept running lists of Congressional and other candidates who at some point shared something related to Q. The 2020 list ran to 106 candidates,¹⁰ while in 2022 the site created lists for Q-supporting Congressional candidates,¹¹ gubernatorial hopefuls,¹² and state or local office candidates running for offices that would have a role in administering elections.¹³ Most of the candidates on these lists are Republican, though a smaller number are either independent or Democrat. And every single one had acted in a way that indicated they believed – or were at least comfortable expressing their support for – the tenets of QAnon, usually by sharing Q slogans and quotes on social media.¹⁴

¹⁰ Alex Kaplan, “Here are the QAnon supporters running for Congress in 2020,” MEDIA MATTERS (Jan. 7, 2020), <https://www.mediamatters.org/qanon-conspiracy-theory/here-are-qanon-supporters-running-congress-2020>.

¹¹ Alex Kaplan, “Here are the QAnon supporters running for Congress in 2022,” MEDIA MATTERS (June 2, 2021), <https://www.mediamatters.org/qanon-conspiracy-theory/here-are-qanon-supporters-running-congress-2022>.

¹² Alex Kaplan, “Here are the QAnon supporters running for Governor in 2021 and 2022,” MEDIA MATTERS (Aug. 19, 2021), <https://www.mediamatters.org/qanon-conspiracy-theory/here-are-qanon-supporters-running-governor-2021-and-2022>.

¹³ Alex Kaplan, “Multiple people seeking to run state elections are connected to QAnon,” MEDIA MATTERS (Aug. 16, 2021), <https://www.mediamatters.org/qanon-conspiracy-theory/multiple-people-seeking-run-state-elections-are-connected-qanon>.

¹⁴ Like the Flynn family in this litigation, some of these candidates have walked back their support of QAnon or claimed they do not know what it is. Maybe the most well-known member of Congress who has endorsed and later disclaimed QAnon is Georgia Rep. Marjorie Taylor Greene, who regularly spread conspiracy theories on social media before and while she was running for office. As part of this belief, Greene often spoke approvingly of QAnon

While many of these were fringe candidates who had little success, several were covered extensively by the US media. Among them were Oregon Republican Jo Rae Perkins, who won the Senate primary in 2020 and 2022 and routinely used QAnon catchphrases, including giving an interview with a WWGIWGA sticker in the background;¹⁵ Minnesota Republican Danielle Stella, who gave a statement claiming she “stands 100% behind the principles of patriotism, unity/inclusiveness (WWGIWGA!) and love for country that QAnon promotes;”¹⁶ and Republican tech investor Shiva Ayyadurai, who claims to have “invented email” and has retweeted multiple messages with WWGIWGA in them.¹⁷

Even after Trump left office and Q had essentially stopped posting, political candidates continued to endorse the Q movement and its ideas. Many ran in 2022 after espousing Q catchphrases and theories that the 2020 election was stolen, only to back down from their public endorsements:

- Colorado Congresswoman Lauren Boebert won re-election in 2022 after publicly endorsing QAnon and appearing on the livestreams of several major QAnon promoters, including Ann Vandersteel, who frequently hosts members of the Flynn family on her show.
- Losing Michigan secretary of state candidate Kristina Karamo attended the QAnon-themed “Patriot Double Down” conference in Las Vegas in 2021 and had been endorsed by the QAnon influencer “Juan O. Savin,” only for her campaign to announce Karamo “does not and never has supported QAnon.”
- Nevada secretary of state nominee Jim Marchant also attended the “Patriot Double Down” conference, followed numerous QAnon influencers on social media, and rehashed the text of Q drops – while also claiming not to know that the Las Vegas conference was linked to Q. Like Karamo, Marchant lost in the general election.¹⁸

As in these circumstances, it is common in QAnon to claim you know nothing about Q, while signaling to other believers that you do. This denial of supporting Q even while endorsing Q extends to figures in the overlapping circles of lawyers, pundits, and content creators close to Donald Trump. In one example, Sidney Powell has spread conspiracy theories about the Deep State, George Soros, and the “real” controllers of the Federal Reserve—all constant targets of QAnon. She appeared on the “Patriot’s Soapbox” QAnon YouTube show, and has retweeted major QAnon promoters, while using QAnon catchphrases in her tweets, including making references to “The Storm.”¹⁹

and used its catchphrases and key concepts, including tweeting “WWGIWGA” at least once. Greene would later disavow QAnon, claim she had nothing to do with it, and was merely “sucked into” false claims she had read online.

¹⁵ Kaplan, *supra* note 10.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ewan Palmer, *Sidney Powell’s Ties to QAnon Movement Explained*, NEWSWEEK (Dec. 3, 2020), <https://www.newsweek.com/sidney-powell-qanon-voter-fraud-lawsuits-georgia-1552050>.

All the while, Powell was denying that she had anything to do with Q or even knew what it was, telling Politico in an email “I don’t know anything about Q Anon [sic], or Q. I couldn’t tell you what that was.”²⁰

General Flynn has especially walked this tight rope. He has openly supported and fundraised off QAnon, freely used its catchphrases, and lent his own “Digital Soldiers” branding to the Q movement. General Flynn wore bracelets stamped with “WWG1WGA,” signed copies of his book *The Field of Fight* with the slogan “Where We Go One, We Go All” [REDACTED].²¹ He was also photographed holding and auctioning off a homemade quilt with a large Q on it at the Q-themed “For God and Country Patriot Roundup” in Dallas in May 2021, and appeared on Jeffrey Pedersen’s “MG Show” livestream with his brother Joe on July 22, 2021, with the page for the episode on Rumble including WWG1WGA in the episode description, and Pedersen exclaiming “Where We Go One, We Go All” – which both General Flynn and his brother enthusiastically repeat.²²

But after both the QAnon involvement in the January 6 Capitol riot and the inauguration of President Biden, General Flynn has publicly [REDACTED] disparaged QAnon, claimed that “there is no plan,” and on a phone call with Trump attorney Lin Wood (another figure who has both praised and denigrated the QAnon movement), called QAnon “disinformation” and “CIA-run nonsense.”²³ All the while, he has been appearing at conferences where Q branding routinely appears and using ideas almost identical to Q.

In their Amended Complaint, Jack and Leslie Flynn correctly point out that QAnon has been condemned as a domestic terror threat by “the House of Representatives, the FBI and DHS,” and compared by the media to ISIS and the Nazi Party. But they do not mention that, even though they now find it uncomfortable, for months they felt comfortable praising QAnon followers, using its slogans, raising money off it, and that Jack claimed on Twitter once that if Q supported the Constitution, then it was “no harm, no foul.”²⁴

VI. GLOSSARY OF KEY TERMS

QAnon has its own jargon. It is a language of acronyms, codes, catchphrases, and hashtags that mean nothing to most people, but become a way that Q believers can signify their belief to others. And understanding them is the key to unlocking how QAnon works, why it sucks people

²⁰ Keith Kloor, *The #MAGA Lawyer Behind Michael Flynn’s Scorched-Earth Legal Strategy*, POLITICO MAG. (Jan. 17, 2020), <https://www.politico.com/news/magazine/2020/01/17/maga-lawyer-behind-michael-flynn-legal-strategy-098712>.

²¹ Ex. 37 (Travis View, “Gen. Flynn likes to play footsie with the QAnon community. For example, at the Gateway Eagle Council in September, he signed a few books with the Qanon slogan. More recently, Flynn changed his Twitter background image to an image taken from a video by a prominent Q believer.” @Travis_View, TWITTER (Nov. 23, 2018), https://twitter.com/travis_view/status/1066134346342424576).

²² “MG Show Presents General Flynn & Joe Flynn,” RUMBLE (July 22, 2021), <https://rumble.com/vk6v0u-mg-show-presents-general-flynn-and-joe-flynn.html>.

²³ David Gilbert, “Michael Flynn Says QAnon Is CIA-Run ‘Nonsense.’ His Supporters Don’t Care,” VICE (Nov. 29, 2021), <https://www.vice.com/en/article/3abbkb/michael-flynn-dismisses-qanon-leaked-call-lin-wood>.

²⁴ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 14).

in, and why a person can plausibly claim that they know nothing about QAnon while spouting its terminology and mythology.

Crucially, many of these phrases sound completely banal. Q is full of what the sociologist Robert Lifton dubbed “thought-terminating cliches,” simple phrases that reinforce belief for those who know what the phrase means, and have little meaning to those outside the belief system. “Where We Go One, We Go All” is the best known, but others in this genre include “trust the plan” or “nothing can stop what’s coming” or “you have more than you know” or “future proves past.” Using them means you are in the “in group,” talking to friendly people who share your values and have “learned the comms,” to quote another Q catchphrase.

When Q supporters use these phrases or post on these sites, they are signaling their support for each other and letting each other know that they are among friends who will not “cancel” them or ridicule their beliefs. They do not proclaim their belief by saying they are believers – they do it by using coded language like the following:

A. “WWG1WGA” / “Where We Go One, We Go All” – appears in 201 Q drops

It is just a simple seven-word phrase, similar in tone and sentiment to cliches like “all for one and one for all” or “together we stand, divided we fall.” But the phrase “Where We Go One, We Go All” is crucial to this case – both understanding what it means, and determining where it came from.

Jack and Leslie Flynn alleged that “Where We Go One, We Go All,” is a simple expression of family unity. They have referred to it as “a family motto” and claimed it is simply a harmless bit of patriotism and based on various classics of literature.

But “Where We Go One, We Go All” is not that. It is a key catchphrase in the QAnon movement, and is popularly used only by the QAnon movement.

QAnon first used it in a post on January 8, 2018, writing:

IMPORTANT:
NO private comms past/present/future.
NO comms made outside of this platform.
Any claims that contradict the above should be considered FAKE NEWS and disregarded immediately.
WHERE WE GO ONE, WE GO ALL.
PATRIOTS.
Q²⁵

After that post, Q used both “Where We Go One, We Go All” and its abbreviation “WWG1WGA” in hundreds of posts, often in replies to tweets that Q spotlighted. The phrase quickly made its way to a raft of Q merchandise and promotional items, and continues to be the most well-known and shared catchphrase in the Q movement. When a political candidate is labeled a “QAnon believer,” it is usually because they shared a variation on “Where We Go One, We Go

²⁵ Ex. 33 (<https://qposts.online/post/513>).

All” on social media – including at least a dozen of the politicians on Media Matters’ 2020 QAnon candidates list, including those with national coverage like Jo Rae Perkins and Danielle Stella.

Flynn family members embraced the phrase by selling merchandise branded with WWG1WGA to pay off General Flynn’s legal bills. General Flynn and his wife, Lori, sold merchandise that said #WWG1WGA and other Q-branded material for a website called “The Shirt Show.” And they knew it was a phrase associated with QAnon. [REDACTED]

[REDACTED] Jack Flynn, on at least one occasion, retweeted a tweet from a woman who had received a “WWG1WGA” T Shirt which was to benefit the Legal Defense Fund.²⁷

In their Amended Complaint, the Flynns imply that there is a genuine debate over the origin of the phrase, claiming:

According to some, the phrase “Where We Go One, We Go All” was first engraved on a bell on one of President John F. Kennedy’s sailboats, acknowledging the unity of mankind. In his video published on July 4, 2020, General Flynn intended to encourage people to think about being good citizens, to love country and be good patriots. The video had nothing to do with QAnon or recruiting “Digital Soldiers” for an apocalyptic reckoning. [https://www.washingtonexaminer.com/news/michael-flynnrecites-oath-of-office-using-slogan-associated-with-qanon]. Others say that the phrase “Where We Go One, We Go All” is inscribed on the bell of the 1911 brigantine rigged sailing ship Eye of the Wind. [https://www.eyeofthewind.net/en/gallery-ship?os_image_id-335].

Eye of the Wind was used in the Ridley Scott-directed film White Squall (1996), where the ship was called Albatross. Captain Christopher Sheldon (played by actor Jeff Bridges) says in the film, “If we don’t have order, we have nothing. Where We Go One, We Go All.” Still others say that the phrase “Where We Go One, We Go All” is similar to the Latin “Unus pro omnibus, omnes pro uno”, made famous in the Alexandre Dumas novel The Three Musketeers (1844) as “All for one, and one for all.”²⁸

²⁶ [REDACTED]

²⁷ [REDACTED]

²⁸ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 4).

The implication is that this debate absolves the Flynn family of using it in connection with QAnon, because nobody can agree on where the phrase came from – “some” say one thing and “others” say something else. This is false.

In fact, far from providing an alternative explanation, the Flynn’s description of the phrase is itself consistent with QAnon lore. As the Amended Complaint acknowledges, the phrase is etched into the bell of the schooner *Eye of the Wind*, first built in 1911. The film *White Squall* used *Eye of the Wind*²⁹ as a set, and took the language “Where We Go One, We Go All” from the engraving on its bell. But what the Amended Complaint does not acknowledge is that until *White Squall* was released, the phrase had no popular footprint. And as *White Squall* was a box office bomb, it stayed in obscurity until Q revived it in a Q drop in 2018.³⁰

In their Amended Complaint, Jack and Leslie Flynn alternatively claim that “Where We Go One, We Go All” was “first engraved on a bell on one of President John F. Kennedy’s sailboats, acknowledging the unity of mankind” and purport to include screenshots of tweets from Jack asking for a “photo of Kennedy’s Brass Deck Bell [sic]” that shows the statement is also a QAnon belief. The Amended Complaint also shows Jack later thanking Sidney Powell for “posting the bell.”³¹ But this claim is provably false. There is no such photo of any such bell on the deck of any yacht owned by the Kennedys. The photos they use of the engraved bell are either photos of *Eye of the Wind* or stills from *White Squall*, including one posted by Q on April 9, 2020.³² Even making this statement shows that Jack and Leslie Flynn are steeped in QAnon lore.

Similarly, when asked about the oath by the *New York Times*, Sidney Powell (who is not named in the story) claimed it was an interpretation of “the works of a 16th-century poet.”³³

On Twitter several days after the video was posted, Powell again claimed the phrase “represents the sentiments expressed by John Donne in For Whom the Bell Tolls [sic]” while sharing a meme with the “digital soldier oath” – including WWG1WGA. And when asked by the *Washington Examiner* about the phrase, Powell would offer yet another explanation, that it was engraved on the bell of John F. Kennedy’s yacht.³⁵

²⁹ Anita Chabria, “Lizard people, deadly orgies and JFK: How QAnon hijacked Hollywood to spread conspiracies,” L.A. TIMES (Dec. 7, 2021), <https://www.latimes.com/california/story/2021-12-07/how-qanon-has-hijacked-hollywood-movies-for-conspiracy-theories>.

³⁰ Moreover, it is not unusual for Q to appropriate concepts from Hollywood films. Much of Q’s mythology and iconography are cribbed from sci-fi films like *The Matrix* and *Blade Runner 2049*, while the Q poster makes numerous direct references to the films *The Godfather Part III*, *Alice in Wonderland*, and *Iron Eagle*.

³¹ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 13).

³² Ex. 45 (<https://qposts.online/post/3924>).

³³ Matthew Rosenberg & Jennifer Steinhauer, “The QAnon Candidates Are Here. Trump Has Paved Their Way,” N.Y. TIMES (July 14, 2020), <https://www.nytimes.com/2020/07/14/us/politics/qanon-politicians-candidates.html>.

³⁴ [REDACTED]

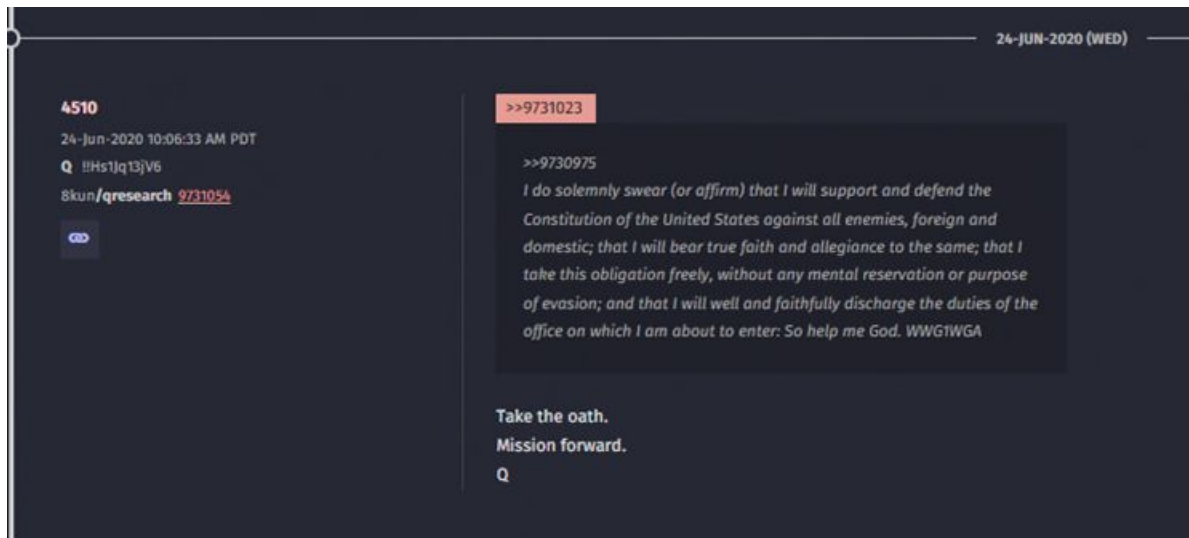
³⁵ Jerry Dunleavy, “Michael Flynn recites oath of office using slogan associated with QAnon,” WASH. EXAMINER, (July 5, 2020), <https://www.washingtonexaminer.com/news/michael-flynn-recites-oath-of-office-using-slogan-associated-with-qanon>.

To be clear, before 2018, the phrase had virtually no other cultural imprint, nor is it a generic statement of patriotism or support, and it was never the “Flynn family motto” as the family has claimed.³⁶

It did not originate in *The Three Musketeers* or in “For Whom the Bell Tolls.” It was not engraved on any part of any boat John F. Kennedy ever owned. It was unearthed by Q from the flop film *White Squall*. It is a QAnon slogan, and only a QAnon slogan.

B. Take the Oath – appears in one Q drop, ten days before Flynn takes the oath

On June 24, 2020, in Q drop #4510, Q used the phrase “Take the Oath” (not as a hashtag) with its full text reading:



The hashtag exploded in popularity after the Q drop on June 24, 2020, generating more than 800,000 tweets in the two weeks between the Q drop and General Flynn’s posting of the video on July 4, 2020.³⁹ Over 650,000 of these tweets included #TakeTheOath, and half included the hashtag #WWG1WGA.⁴⁰

³⁶ David Gilbert, “Michael Flynn’s Family: That QAnon Oath Video Is Just Our Family Motto,” VICE (July 7, 2021), <https://www.vice.com/en/article/akgny8/michael-flynn-s-family-that-qanon-oath-video-is-just-our-family-motto>.

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³⁹ Ex. 13 (PX_250).

⁴⁰ Ex. 57 (Shayan Sardarizadeh, “The meteoric rise of #TakeTheOath[.] On 24 June on 8kun, Q asked believers in QAnon conspiracy [sic] theory to symbolically take the oath on social media platforms. Since then, the hashtag has

Sometime on June 27, 2020 – just a few days after the Q drop commanding “take the oath” – but before the family filmed its video, General Flynn changed the text of his Twitter profile to include #TakeTheOath, along with a US flag emoji.⁴¹ By that point, Q believers had already started filming videos of themselves reciting it. Many had Q iconography in their Twitter profiles, including WWG1WGA, and wore Q shirts or displayed Q flags when they recited the lines. And far from just rank-and-file believers taking the oath, as at least one prominent Republican candidate for office in 2020, Oregon Senate candidate Jo Rae Perkins, recorded themselves using the QAnon phrase.⁴²

On June 29, 2020, Twitter user @wgabrittany made her “first post as a digital soldier” with the hashtags #TakeTheOath, #qanon, #wwg1wga, before concluding with “God bless the United States of America.”⁴³

The Flynn family took the oath on the Fourth of July, raising their right hands and reciting the Constitutional Oath of Office and adding “Where We Go One, We Go All” and “God bless America” at the end, just like both the Q drop and Twitter user @wgabrittany instructed. Then they shared it on Twitter,

⁴⁴

General Flynn’s use of the hashtag, and Jack Flynn’s frequent shares of it, had as much to do with the phrase trending on Twitter in July 2020 as Q’s post in June did. Due in part to the Flynn family’s constant sharing, the video clip of “the oath” amassed more than one million views in just a few days.

generated nearly 800,000 tweets, with many followers posting videos of themselves doing it,” @Shayan86, TWITTER (July 6, 2020), <https://twitter.com/Shayan86/status/1280287853394776064>).

⁴¹ The hashtag appears in an archived link to Flynn’s profile dated June 27, 2020, Ex. 77 (<https://web.archive.org/web/20200627044312/twitter.com/genflynn>), and does not appear in an archived link on June 26, 2020, Ex. 78 (<https://web.archive.org/web/20200626230452/twitter.com/genflynn>).

⁴² Rosenberg & Steinhauer, *supra* note 33.

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After General Flynn tweeted the video of his siblings and their spouses “taking the oath,” the coverage laser-focused on the phrase’s link to QAnon. “Fmr. NSA Michael Flynn apparently takes ‘QAnon’ oath on Independence Day,” was the headline of the story on MSNBC after the video was made public, with the sub-headline adding “Over the Independence Day weekend, Former National Security Advisor Michael Flynn was recorded reciting the Qanon [sic] pledge.”⁴⁷

The headline on *Mother Jones* that day read, “To Celebrate the Fourth, Michael Flynn Posts a Pledge to Conspiracy Group QAnon,”⁴⁸ while Canada’s CTV wrote a story on the video titled “Michael Flynn takes QAnon oath in Fourth of July video.”⁴⁹ *The Independent*, *Salon*, *Politico*, and many others also covered the video, all specifically calling it a “QAnon oath” and including the video of the Flynn family in their coverage.

The right-leaning *Washington Examiner* published a story on July 5, 2020, on the “take the oath” video, explicitly saying “Flynn and the others ended the short video by quoting a popular QAnon slogan — ‘Where We Go One, We Go All!’”⁵⁰

Two weeks after the oath video was posted, the *New York Times* called it the “QAnon digital soldier oath” – using the phrase that General Flynn had trademarked – and noted that General Flynn was only among the most recent high-profile people to recite it.

And in reporting nearly a month after the video was posted, the *Washington Post* included General Flynn having “recently recorded a video of himself repeating an oath originating on 8kun” as part of its reporting on the FBI designating QAnon a domestic terror threat.⁵¹

Even in the reporting on the lawsuits filed by Jack and Leslie Flynn against CNN, the phrase is explicitly referred to as a QAnon oath. All told, dozens of news outlets in the US and abroad have linked the Flynnns with QAnon specifically because they joined in on the #TakeTheOath movement and used the QAnon slogan.⁵²

C. “Digital Soldier” – appears in two Q drops

Another important phrase in the QAnon movement was first coined by General Flynn himself. On November 12, 2016, just days after Donald Trump’s victory in the presidential election, General Flynn addressed an event for the Young America’s Foundation, one of the founding sponsors of the far-right CPAC conference. General Flynn told the visibly young, deeply

⁴⁷ MSNBC (July 6, 2020), <https://www.msnbc.com/msnbc/watch/fmr-nsa-michael-flynn-takes-qanon-oath-on-independence-day-87107141992>.

⁴⁸ Jackie Mogenson, ““To Celebrate the Fourth, Michael Flynn Posts a Pledge to Conspiracy Group QAnon,” MOTHER JONES (July 5, 2020), <https://www.motherjones.com/politics/2020/07/to-celebrate-the-fourth-michael-flynn-posts-a-pledge-to-conspiracy-group-qanon/>.

⁴⁹ Ryan Flanagan, “Michael Flynn takes QAnon oath in Fourth of July video,” CTV NEWS (July 5, 2020), <https://www.ctvnews.ca/world/michael-flynn-takes-qanon-oath-in-fourth-of-july-video-1.5012437?cache=>.

⁵⁰ Dunleavy, *supra* note 35.

⁵¹ Isaac Stanley-Becker, “How the Trump campaign came to court QAnon, the online conspiracy movement identified by the FBI as a violent threat,” WASH. POST (August 2, 2020), https://www.washingtonpost.com/politics/how-the-trump-campaign-came-to-court-qanon-the-online-conspiracy-movement-identified-by-the-fbi-as-a-violent-threat/2020/08/01/dd0ea9b4-d1d4-11ea-9038-af089b63ac21_story.html.

⁵² I have attached a more complete list of articles linking the “oath video” to QAnon, marked Exhibit 73.

Trump-devoted crowd that what had just taken place was “not an election” but a “revolution” – and that the barricades in this revolution had been manned by “an army of Digital Soldiers” who had helped Trump completely turn politics as usual upside down through innovative online campaigns and organizing.⁵³

“Digital Soldiers” became the shorthand for the fanatically devoted troll army that invaded the online space in the runup to the election, creating and spreading conspiracy theories about Hillary Clinton to audiences that would never normally look at it. In particular, Trump’s young fans would embrace memes as a tool for communication, spreading inflammatory pictures of Hillary Clinton, graphics making Donald Trump look heroic and masculine, and in at least one case, improper information about voting to share with Clinton supporters. Ultimately, the phrase gained traction in the QAnon community, and these memes became important ways of signaling to each other among members of the Q community, particularly after, as discussed above, Q instructed his followers to have “memes at the ready.”⁵⁴

The members of this “army of Digital Soldiers” saw General Flynn as their leader as much as General Flynn saw them as his army, waging a kind of irregular warfare where image boards and Twitter replies were just as significant battlefields as those in the physical space. And the concept of Digital Soldiers would play a major role in the next stage of General Flynn’s career.

There is no evidence that General Flynn played any role in the creation of QAnon – a claim that Jack and Leslie’s Amended Complaint alluded to, attributing it to unnamed “left-wing media outlets.”⁵⁶ But QAnon quickly became an efficient way for him to recruit more people to his cause, and to pay off his legal bills. The iconography of the “Digital Soldier” movement was a huge part of this – followers routinely added three stars to their Twitter bios to honor General Flynn’s three-star general rank, used hashtags like #DigitalSoldier, #AllInForFlynn, and #FlynnFridays, and bought merchandise with similar branding – much of it endorsed by General Flynn and his extended family and supporters. The phrase was even used by General Flynn for a crowdsourced journalism venture called “Digital Soldiers,” which had a website that proclaimed “Digital Soldiers from all over the world have stepped up to fill the void where real journalism once stood.”⁵⁷

And much of the reporting based around the oath taken from the July 4, 2020 video explicitly called it the “Digital Soldier Oath.”

⁵³ Candace Rondeaux, “The Digital General,” INTERCEPT (June 27, 2021), <https://theintercept.com/2021/06/27/qanon-michael-flynn-digital-soldiers/>.

⁵⁴ Ex. 36 (<https://qposts.online/post/2147>).

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⁵⁶ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 2).


⁵⁷ Matthew Rosenberg, “Pushing QAnon and Stolen Election Lies, Flynn Re-emerges,” N.Y. TIMES (Feb. 6, 2021), <https://www.nytimes.com/2021/02/06/us/politics/michael-flynn-qanon.html>.

While the term “Digital Soldier” is a huge part of General Flynn’s branding and financial ties to the Q movement, Q only uses it twice, first in Q drop #4509, writing that those “chosen to serve their country” have the mission to “Support role of other digital soldiers [one falls another stands (rises)]” and then in Q drop #4637, responding to a Trump tweet with the phrase “Digital soldiers #FightBack.”

It is telling that Q was posting about General Flynn at almost the exact same time as the Flynn family was taking the oath, writing a sequence of drops that are unmistakably about General Flynn and his role among QAnon believers.

This sequence of drops, all of which were posted on June 24, 2020, is:

- Q drop #4506, posted at 11:22 AM Eastern Time, an hour and a half before the “oath” drop, where Q writes:



The People’s General.
Soon.

Q⁵⁸

The drop clearly is a reference to General Flynn, as the three stars refer to the three stars he held as a lieutenant general, which General Flynn’s supporters on Twitter would include in their bio. And numerous supporters have referred to General Flynn as “the People’s General.”

- Q Drop #4507, posted at 11:36 AM Eastern Time, is a tweet from the right-wing influencer “Techno Fog” that references the exchange between General Flynn and Russian ambassador Sergey Kislyak⁵⁹
- Q Drop #4508, posted at 12:20 PM Eastern Time, is a meme claiming Barack Obama committed treason⁶⁰
- Q Drop #4509, posted at 1:01 PM Eastern Time, was the first use by Q of the phrase “Digital Soldiers”⁶¹
- Q Drop #4510, posted at 1:06 PM Eastern Time, was the “Digital Soldier Oath,” that General Flynn spoke and his family echoed on July 4, 2020⁶²

The Q poster did not actually reference the Flynn video, as Q took two weeks off from posting from July 2 to July 17, 2020. But Q also uses other variations, such as “digital battleground” or “digital battlefield” or “information warfare” – a phrase General Flynn uses often, and which served as the inspiration for his 2022 book on Fifth Generation warfare.

Digital Soldiers is a term General Flynn created, gave meaning to, and exploited for his own purposes. QAnon believers thought they were Digital Soldiers, saw General Flynn as their commander, and General Flynn and his family were happy to be perceived that way, because it

⁵⁸ Ex. 49 (<https://qposts.online/post/4506>).

⁵⁹ Ex. 50 (<https://qposts.online/post/4507>).

⁶⁰ Ex. 51 (<https://qposts.online/post/4508>).

⁶¹ Ex. 52 (<https://qposts.online/post/4509>).

⁶² Ex. 53 (<https://qposts.online/post/4510>).

raised money for his Legal Defense Fund. And Jack and Leslie Flynn promoted the Legal Defense Fund using “Digital Soldiers” and WWG1WGA when possible.

D. The Storm – appears in 13 Q drops

The concept of “The Storm” is a critical part of the QAnon mythology. It represents the long-awaited purge of President Trump’s enemies, carried out by military tribunals, with the verdict always being guilty. In particular, many Q drops use the term “The Calm Before the Storm,” in reference to a cryptic phrase used by President Trump in early October 2017 at a gathering of military officers, and whose meaning has never been fully explained.⁶³

Q teased “The Storm” for years, often linking it to promises that it would occur “soon”⁶⁴ or in a “BIG week ahead.”⁶⁵ As Trump’s presidency ended the idea of him enacting mass arrests, the concept of “The Storm” shifted to become one where Biden’s presidency was ended with force or legal action – a concept General Flynn has endorsed on numerous occasions. Using either definition, as part of the general undercurrent of QAnon, “The Storm” is a violent and deeply undemocratic attack on the personal enemies of Donald Trump, carried out by armed military personnel and supported online by Trump’s “Digital Soldier” army – the same one assembled for him by General Flynn back in 2016.

E. The Great Awakening – appears in 54 Q drops

Though the term dates to American religious revivals of the 1730s, Q uses the idea of the “Great Awakening” to denote believers throwing off the shackles of their corporate media slumber and “waking up” to “what’s really going on.” The Awakening, according to Q followers, will mean believers are “sheep no more” and gain “freedom of thought” where they will not believe “fake news” anymore.

General Flynn’s ReAwaken America tour has adapted Q’s idea of the Great Awakening as one of its central tenets, with 2022 shows branded as “The Great Awakening vs. The Great Reset.”⁶⁶ The slogan has a double meaning. The first is that it references the “Great Reset” concept that has formed the core of right-wing conspiracy theories for the last year, including those about the World Economic Forum, the merging of humans and machines, and the origin of COVID-19 that General Flynn has heavily endorsed.⁶⁷ It is also a reference to the 2021 book *The Great Awakening vs. The Great Reset*, written by Alexander Dugin, the ultranationalist Russian political philosopher.

⁶³ Mark Landler, “What did President Trump Mean by ‘The Calm Before the Storm?’” N.Y. TIMES (Oct. 6, 2017), <https://www.nytimes.com/2017/10/06/us/politics/trump-calls-meeting-with-military-leaders-the-calm-before-the-storm.html>.

⁶⁴ Ex. 34 (<https://qposts.online/post/809>).

⁶⁵ Ex. 35 (<https://qposts.online/post/1933>).

⁶⁶ Joanne Beck, “ReAwaken America? Not here, say local Christian leaders planning protest,” BATAVIAN (July 23, 2022), <https://www.thebatavian.com/joanne-beck/reawaken-america-not-here-say-local-christian-leaders-planning-protest/612088>.

⁶⁷ Gerrard Kaonga, “Michael Flynn Claims People Working on Putting Robotics in Us, Changing DNA,” NEWSWEEK (Sept. 21, 2022), <https://www.newsweek.com/michael-flynn-robotics-dna-changing-transhumanism-1744880>.

Beyond those connections, General Flynn has monetized the “Great Awakening” concept directly, using the “Shirt Show” website to sell WWGIWGA clothing and hats using the description “It’s no conspiracy and it’s certainly more than a theory. The Great Awakening is happening and the signs are everywhere.”⁶⁸

VII. GENERAL MICHAEL FLYNN’S CONNECTIONS TO AND FINANCIAL STAKE IN QANON

General Flynn and the Flynn family, including Jack and Leslie Flynn, exploited the QAnon movement to pay the increasingly large legal bills associated with General Flynn’s prosecution by Special Counsel Robert Mueller. On May 2, 2019, General Flynn registered the phrase “Digital Soldiers” as a trademark.⁶⁹ He also bought the URL to numerous websites including ResilientPatriot.com and DigitalSoldiers.us, which would eventually redirect to the website for the Legal Defense Fund.⁷⁰

The finances of General Flynn’s Legal Defense Fund are extremely opaque, but Jack Flynn relentlessly promoted the Fund on Twitter and elsewhere. [REDACTED]

General Flynn also sought to profit off the QAnon movement, a quest supported by Jack and Leslie Flynn. In May 2019, General Flynn launched a pay-to-publish venture on UncoverDC, an independent right wing media site run by early QAnon evangelist Tracy “Beanz” Diaz. The site planned to sell \$125 subscriptions, and charge \$2,000 to access group chats, \$3,000 to have a debate with General Flynn or Diaz, or \$6,000 for the right to be listed on the “founders page.”⁷² It is not clear how many of these ventures went live or for how long, but the “Digital Soldiers” journalism site was still a going concern at least as of February 2021, when *The New York Times* reported on General Flynn’s effort to launch the platform – and expressly commented on his links to QAnon.⁷³

In September 2019, General Flynn helped to organize the “Digital Soldiers Conference” in Atlanta, selling \$99 general admission tickets for the conference, while a “VIP All Day” pass would cost \$500. Those interested in a sit-down dinner with General Flynn and front-row access

⁶⁸ Will Sommer, “Michael Flynn is Now Selling QAnon Merch,” DAILY BEAST (Dec. 29, 2020), <https://www.thedailybeast.com/michael-flynn-is-now-selling-qanon-merch>.

⁶⁹ Ex. 40 (“Digital Soldiers,” Michael T. Flynn, USPTO (filed May 2, 2019)).

⁷⁰ Rondeaux, *supra* note 53.

⁷¹ [REDACTED]

⁷² Rondeaux, *supra* note 53.

⁷³ Rosenberg, *supra* note 57.

to speeches could buy the “Ultra VIP” ticket package for \$2,500.⁷⁴ General Flynn would pull out of the conference shortly before it was meant to take place, reportedly because of the reaction to its links to QAnon. But even after pulling out and cancelling the conference, the website continued to direct donations to the Legal Defense Fund.⁷⁵

In December 2020, General Flynn, Lori Flynn, Barbara Flynn Redgate, and Michael Flynn, Jr. became involved in the daily business decisions of the merchandise site “Shirt Show USA” which sold Flynn-branded hats, T-shirts, women’s workout wear, and sweatshirts with the phrase “WWG1WGA,” a reference to “Where We Go One, We Go All.” [REDACTED]

The Shirt Show website continues to sell items with the phrases WWG1WGA and #IStandWithFlynn, but after General Flynn’s pardon, all proceeds stay with The Shirt Show. [REDACTED]

Even after the election of President Biden, General Flynn sought to profit off of QAnon. In April 2021, General Flynn launched the ReAwaken America tour, co-founded with Oklahoma businessman Clay Clark. Featuring a rotating roster of speakers, the tour offered conspiracy theories about the election, COVID-19, and various culture war issues, all seen through the lens of QAnon and other similar theories. ReAwaken America is also a serious profit generator for both Clark and General Flynn, as it sells \$500 tickets and \$1,000 VIP tickets along with merchandise, and usually sells out 3,000 – 5,000 seat venues. In total, each tour stop brings in an average of \$300,000, according to reporting from *Rolling Stone*.⁷⁹

Many of the speakers on the tour are connected to QAnon, either directly endorsing it or speaking favorably of its ideas on their own podcasts and livestreams – which General Flynn, in turn, regularly appears on. Among the most prominent are:

- Tour co-founder Clay Clark, who appeared on the QAnon-themed podcast the MG Show, co-hosted by a major figure in the QAnon world, and asked questions relevant to QAnon believers such as “what three things make you think Q is credible.”⁸⁰

⁷⁴ Ibid.

⁷⁵ Ex. 41 (<https://web.archive.org/web/20190915150412/https://digitalsoldiersconference.com/>).

⁷⁶ [REDACTED]

⁷⁷ [REDACTED]

⁷⁸ [REDACTED]

⁷⁹ Sam Kestenbaum, “‘I Think All the Christians Get Slaughtered’: Inside the MAGA Road Show Barnstorming America,” *ROLLING STONE* (Sept. 17, 2022), <https://www.rollingstone.com/culture/culture-features/clay-clark-reawaken-america-maga-tour-trump-1234594574/>.

⁸⁰ MG Show, “Clay Clark Interviews the Guys, Project Veritas, Audits and more!,” *RUMBLE* (Oct. 5, 2021), <https://rumble.com/vncouh-mg-show-100521.html> (last visited June 4, 2023).

- QAnon promoter Ann Vandersteel, who runs a regular podcast called “Steel Truth” and routinely hosts major influencers in the Q community, including General Flynn, Patrick Byrne, the hosts of the MG Show, and Sidney Powell.⁸¹
- Scott Kesterson, who has espoused QAnon, election fraud conspiracy theories, and COVID-19 disinformation on his “BardsFM” podcast – including having General Flynn on as a guest on December 1, 2020.⁸² Joe Flynn has also appeared on “BardsFM” on several occasions, including August 7, 2020,⁸³ and November 26, 2020.⁸⁴

As part of his regular speaking slot, General Flynn regularly urges the crowd to donate to featured speakers – and to his own ventures.⁸⁵

The ReAwaken America conference is completely inseparable from the QAnon community. At these gatherings, General Flynn routinely is feted like a hero, lavished with praise, and speaks approvingly of concepts with a huge amount of support in the QAnon community. Specifically, some of the Q-friendly ideas that General Flynn has endorsed at ReAwaken and other similar conferences include:

- The illegitimate Biden administration being overthrown by a violent coup similar to that in Myanmar.⁸⁶
- The establishment of “one religion” over the entire country, in direct violation of the First Amendment.⁸⁷
- The COVID-19 pandemic was artificially created to sway the 2020 election.⁸⁸
- The 2020 election results were fraudulent, and Mike Pence had the ability to discard “fraudulent” electoral college votes and declare Trump the winner.⁸⁹
- Globalist forces are using the COVID-19 vaccine to turn humans into cyborgs, and use a variety of ways to get unwilling people to ingest it, including “salad dressing.”⁹⁰

⁸¹ Red Voice Media, “Gen. Flynn ‘Now repeat after me, the 2020 presidential election was stolen,’” RUMBLE <https://rumble.com/vj04x7-gen.-flynn-now-repeat-after-me-the-2020-presidential-election-was-stolen.html> (last visited June 4, 2023).

⁸² “A Conversation with LtG (Ret) Michael Flynn,” BARDSFM (Dec. 1, 2020), <https://www.bards.fm/e/ep153-a-conversation-with-ltgret-michael-flynn>.

⁸³ “Interview with Joe Flynn,” BARDSFM (Aug. 7, 2020), <https://www.bards.fm/e/ep92-interview-with-joe-flynn/>.

⁸⁴ “An Interview with Joe Flynn,” BARDSFM (Nov. 26, 2020), <https://www.bards.fm/e/ep152-an-interview-with-joe-flynn/>.

⁸⁵ Kestenbaum, *supra* note 79.

⁸⁶ Maggie Astor, “Michael Flynn suggested at a QAnon-affiliated event that a coup should happen in the U.S.,” N.Y. TIMES (June 1, 2021), <https://www.nytimes.com/2021/06/01/us/politics/flynn-coup-gohmert-qanon.html>.

⁸⁷ Daniel Politi, “Former Trump Adviser Michael Flynn: U.S. Should ‘Have One Religion,’” SLATE (Nov. 14, 2021), <https://slate.com/news-and-politics/2021/11/michael-flynn-america-must-have-one-religion-trump.html>.

⁸⁸ Sophia Ankel, “Former Trump advisor Michael Flynn says the COVID-19 pandemic was fabricated to distract from the 2020 election,” BUS. INSIDER (May 23, 2021), <https://www.businessinsider.com/michael-flynn-says-coronavirus-made-up-to-distract-from-election-2021-5>.

⁸⁹ Aram Roston, et al., “The military-intelligence veterans who helped lead Trump’s campaign of disinformation,” REUTERS (Dec. 15, 2021), <https://www.reuters.com/investigates/special-report/usa-election-military/>.

⁹⁰ Ryan Bort, “Michael Flynn Thinks They Might Be Putting the Covid Vaccine in Your Salad Dressing,” ROLLING STONE (Sept. 23, 2021), <https://www.rollingstone.com/politics/politics-news/michael-flynn-covid-vaccines-salad-dressing-pastor-1230601/>.

- The United States government has been infiltrated by “demons” and a holy war fought by “spiritual warriors” wearing the “armor of God” is the only thing that can save the nation.⁹¹

General Flynn’s family members are also involved in the ReAwaken America tour,

Despite General Flynn’s protestations, the Q movement and the people who are part of it represent a critical demographic in this effort. He would continue to share posts including “WWG1WGA” on Telegram into 2022⁹⁴, and continues to make numerous appearances on the media content of some of the biggest promoters in the QAnon sphere to this day – all while claiming QAnon is a nonsensical psyop.

VIII. JACK AND LESLIE FLYNN’S CONNECTIONS TO QANON

In their legal filings against CNN, Jack and Leslie Flynn claim that CNN had “no basis for linking Leslie or Jack to any domestic violent extremist groups, including QAnon.”⁹⁵

I do not believe the CNN report at issue accused Jack and Leslie Flynn of being “QAnon Followers.” But it is clear from both Jack and Leslie Flynn’s social media and their repetition of “Where We Go One, We Go All” on the publicly amplified “Take the Oath” video that any news organization would have had a reasonable basis to link them to QAnon.

Most importantly, taking the oath on July 4, 2020, is only associated with the QAnon movement. And furthermore, immediately after the Flynn’s took the oath, and for months thereafter, the media consistently referred to them as taking the QAnon oath.

Next, the sheer number of statements made in public by Jack Flynn that offer support or approval of QAnon supports the idea that he is a follower. After analyzing the archived contents of his Twitter account @GoJackFlynn, it was reasonable to believe that Jack was interested in Q, quite possibly thought at least some aspect of it was real, and at the very least had no issue with fans of his brother, General Flynn, *thinking* he believed QAnon was real. Jack Flynn also used QAnon iconography to encourage QAnon believers to donate to General Flynn’s Legal Defense Fund.

In Jack and Leslie Flynn’s Amended Complaint, they want to have it both ways: they freely admit Jack often used QAnon hashtags and spoke approvingly of QAnon and its beliefs, while also

⁹¹ Michelle Smith, “Michael Flynn’s ReAwaken Roadshow Recruits ‘Army of God,’” ASSOC. PRESS (Oct. 7, 2022), <https://apnews.com/article/reawaken-america-tour-michael-flynn-910e83b515185751be82868b227ca22e>.

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⁹⁴ @RealGenFlynn, TELEGRAM (Oct. 14, 2021), <https://t.me/RealGenFlynn/956>; @RealGenFlynn, TELEGRAM (Jan. 9, 2022), <https://t.me/RealGenFlynn/1901>.

⁹⁵ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 13).

claiming they do not share those beliefs, and only see Q as a public expression of “belief in the Constitution and equal justice for all.”⁹⁶

By the standards of journalists dealing with QAnon, Jack’s frequent uses of Q phrases would be more than enough evidence for CNN to plausibly claim Jack and Leslie were Q followers, even though they did not do so. Jack Flynn did not just retweet one stray hashtag, or share one tweet from a random account that happened to be a QAnon follower. He tweeted about QAnon *dozens* of times – and quite possibly more. He talked about it often, praised it and its believers, asked questions about it, claimed there was “nothing wrong” with it,⁹⁷ and used its terminology with great familiarity.

For example, over the course of 2019 and 2020, Jack consistently used QAnon hashtags, boosted conspiracy theories embraced by QAnon, shared material directly referencing Q drops, and in particular, used the phrase “Where We Go One, We Go All,” or its abbreviation “WWG1WGA.”⁹⁸ In fact, he turned the popularity of the “Take the Oath” video into social media clout – his Twitter following increased from 104,000⁹⁹ to more than 114,000 in the week after the video went viral.¹⁰⁰ And that upward trend in his follower count continued, as Jack had more than 226,000 followers as of the last archived snapshot of his account, from January 9, 2021. Shortly after, he deleted his @GoJackFlynn account, claiming it was because of Twitter’s suspensions of General Flynn and Donald Trump after the Capitol insurrection. But while he had an account, he was a serious voice in the Q community, and even though he announced he was moving his social media to “Parlor” (the name of the website is “Parler”) he quickly created a new Twitter account, @GoJackFlynn1.¹⁰¹

Because much of his account was never added to the Internet Archive or other archival sources before he deleted it, it is impossible to discern how many times Jack Flynn shared QAnon content. But in the more than 50 days’ worth of posts available on Archive.org and other sites, Jack Flynn shared QAnon content, directly tweeted Q slogans, or talked approvingly of QAnon dozens of times. The actual number might be substantially higher, but without a complete archive, it is impossible to say.

Some of the most notable occasions where Jack spoke approvingly of Q or shared its iconography are:

⁹⁶ ECF No. 7 (Jack and Leslie Flynn Amended Complaint, 14).

⁹⁷ Ex. 60

(<https://web.archive.org/web/20200820010849/https://twitter.com/GoJackFlynn/status/1296252702377336833>).

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⁹⁹ Ex. 54 (<https://web.archive.org/web/20200701034959/twitter.com/gojackflynn>).

¹⁰⁰ Ex. 58 (<https://web.archive.org/web/20200711024726/twitter.com/gojackflynn>).

¹⁰¹ Ex. 71 (<https://web.archive.org/web/20210108181524/twitter.com/gojackflynn>).

September 16, 2019, the first day of available archived posts, Jack retweeted a donor to the “Flynn Defense Fund”, @GodAndCountry11, who included #WWG1WGA in her tweet announcing she had donated \$517.17, with “17” being the numerical value of “Q.”¹⁰²

That same day, Jack retweeted a tweet from @QBlueSky@ featuring screen shots of multiple Q drops and the tag #QAnon.¹⁰³

On November 8, 2019, Jack Flynn retweeted a post from @kaStrange15 reading, “Where We Go One, We Go All” while adding his own message “#WWG01WGA [sic] TO <http://MikeFlynnDefenseFund.org> and make a donation to help This case with a little help with funding...Cause freedom isn’t free!! #DigitalSoldiers Rule.”¹⁰⁴

On April 14, 2020, Jack Flynn retweeted an account that, in turn, was sharing a post from “#ANON ARTS #Q AND A BAND OF ANONS #WWG1WGA”¹⁰⁵

On May 18, 2020, Jack Flynn shared a tweet from QAnon evangelist Veronica Wolski. Wolski, who often wore Q merchandise and handed out Q-themed bracelets to passersby on a Chicago bridge, had posed for a picture with General Flynn signing her QAnon t-shirt. The tweet Jack shared featured Wolski sharing the fact that a previous tweet of hers had been featured in a Q drop, with Flynn writing “This means so much to all of us. Thank you for the time you took to put this all together. God Bless!!”¹⁰⁶

Wolski was a major figure in the QAnon and antivaccine movements,

Jack Flynn continued to retweet Wolski for months

¹⁰² Ex. 42 (<https://web.archive.org/web/20190916171650/https://twitter.com/GoJackFlynn>).

¹⁰³ Ibid.

¹⁰⁴ Ex. 43 (<https://web.archive.org/web/20191109192226/https://twitter.com/gojackflynn>).

¹⁰⁵ Ex. 46 (<https://web.archive.org/web/20200416111906/https://twitter.com/gojackflynn>).

¹⁰⁶ Ex. 47 (<https://web.archive.org/web/20200518132106/https://twitter.com/gojackflynn>).

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¹⁰⁹ Ex. 14 (<https://twitter.com/MadMerlin5/status/1412807406636130309>).

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On July 4, 2020, the day the “Take the Oath” video was taken and shared by General Flynn, Jack spent a large portion of the day retweeting shares of the video, many of which included QAnon iconography. He was not embarrassed by the video, nor did he make any effort to curtail its spread or downplay its links to a known QAnon catchphrase. He did exactly the opposite.

- He retweeted messages from @oldbigmoose saying, “It is time to retake the oath I first took in 1976 to defend the constitution of my United States of America on today. Independence Day 2020 #TakeTheOath #WWG1GWA #GeneralFlynn
- Jack retweeted @TexasProud sharing a still from the video featuring Jack and Leslie taking the oath, including #WWG1GWA
- He later retweeted General Flynn’s post with the clip of the Flynn family reciting the oath (which already had 24,000 retweets) and another quote tweet, specifically using the phrase “Happy Independence Day. WWG1GWA #KAG2020”
- And finally, that same day, Jack shared a picture of General Flynn with a “Matrix” style digital script backdrop and text reading “THE GREAT AWAKENING”¹¹⁴

Two days after the video was taken, on July 6, 2020, Jack Flynn retweeted another QAnon account, this one featuring a picture of the poster for the movie *White Squall* and a picture of the yacht bell on the schooner used as a set in that movie, writing “and @GenFlynn is also OBVIOUSLY a fan of the movie “White Squall” and JFK.” Notably, this ties into the false story that the slogan “Where We Go One, We Go All” was on the bell of Kennedy’s yacht.¹¹⁶

112 [REDACTED]

¹¹⁴ Ex. 55 (<https://web.archive.org/web/20200705165722/https://twitter.com/gojackflynn>).

¹¹⁶ Ex. 56 (<https://web.archive.org/web/20200706233434/https://twitter.com/gojackflynn>).

It's so simple~Yet complex. Like a meritage wine" – referencing the sought-after blend made from Bordeaux grapes.¹¹⁷

Jack made two other QAnon related tweets on July 19:

- In the first, he quote-tweeted his most recent statement, adding "I was told today that QAnons are dangerous people to be aligned with. That there is actually "no plan". True or not, most people seem pretty normal to me who support the idea of Q. I advocate for the Constitution and Bill of Rights. if Q does too~No harm no foul. #KAG2020"
- And later, Jack Flynn retweeted @wwg1wga74768620's tweet saying "They are in full blown PANIC mode, Jack! #WWG1WGA"¹¹⁸

On August 13, 2020, with the video still being shared by Flynn fans, Jack tweeted to ask his followers "What's wrong with the statement: Where We Go 1 We Go All?? ANYONE?? #WWG1WGA."¹¹⁹

The next day, August 14, 2020, Jack Flynn continued to ask his followers for information and opinions on what he deemed the "Q-Anon Movement," asking if it is a "right wing conspiracy theory Group" or a "Pro American Values Centric Mind Set Group."¹²⁰

In a crucial moment in the trajectory of QAnon, President Trump offered praise and encouragement of the movement on August 19, 2020. When asked about QAnon at a White House press conference related to the COVID-19 pandemic, Trump replied by claiming "I've heard these are people that love our country. So I don't know really anything about it other than they do supposedly like me." He then rhetorically asked if helping to save children from satanic sex traffickers "was a good thing or a bad thing," adding, "If I can help save the world from problems, I am willing to do it."¹²¹

The reaction in the QAnon community was immediate excitement and validation. And Jack Flynn shared a number of QAnon-related thoughts on Twitter over the days following Trump's interview.

On August 21, 2020, Jack retweeted an account called @OficialPatriot who asked Q believers to share how they are "normal people" who believe in Q: "Qanon is not violent or conspiracy. We are every day people seeking truth. I am a family man. I am educated, and run my own business. I work hard, and spend my spare time with my family. I enjoy golf 🏌️ and reading. Qanon's, share and tell your story 🗣️🗣️"¹²²

¹¹⁷ Ex. 60

(<https://web.archive.org/web/20200820010849/https://twitter.com/GoJackFlynn/status/1296252702377336833>).

¹¹⁸ Ex. 61 (<https://web.archive.org/web/20200820194450/https://twitter.com/gojackflynn>).

¹¹⁹ Ex. 59

(<https://web.archive.org/web/20200813183501/https://twitter.com/GoJackFlynn/status/1293979344319258625>).

¹²⁰ Ibid.

¹²¹ Katie Rogers and Kevin Roose, "Trump Says QAnon Followers Are People Who 'Love Our Country,'" N.Y. TIMES (Aug. 19, 2020), <https://www.nytimes.com/2020/08/19/us/politics/trump-qanon-conspiracy-theories.html>.

¹²² Ex. 62 (<https://web.archive.org/web/20200821145152/https://twitter.com/gojackflynn>).

On that day, Jack himself wrote two tweets supporting QAnon:

- “I don’t know who or what Q is so there’s that. But no ones [sic] hurting each other it’s civilized encouraging people to learn independently supports trump and the constitution. So. WTF. #WWG1WGA”¹²³
- “Honestly I ask myself about this Q thing and look for a reason not to trust anything about it. I don’t see Qsters in the street breaking into buildings claiming real estate pulling down statues or beating up people in the name of some form of justice or retribution BS.”¹²⁴ Here he is favorably contrasting QAnon to the right-wing media’s version of the “antifa” movement, falsely said to be burning cities and engaging in large-scale rioting and violence on behalf of leftist causes.

The next day, August 22, 2020, Jack retweeted an explicitly Q meme, of an American flag with a giant Q on it and the phrase “Where We Go One, We Go All,” adding “If this means you believe in the constitution and equal justice under the law then this works for me.”¹²⁵

That same day, Jack asked his followers “PLEASE EXPLAIN: What is 8Chan and what is 4Chan? I only listen to Blaze Radio! # WWG1WGA #FreeFlynn us_”¹²⁶

And finally, continuing the comparison he made the previous day, Jack Flynn retweeted a “QAnon vs. Antifa” meme, contrasting the Q movement against the conservative bogeyman antifa by claiming Q had a mission of exposing “evil, corruption, and deception,” using only “keyboards, memes, reason, and truth” while antifa was devoted to inciting violence, hate and division using weapons and vandalism. As part of that meme, the Q side of the meme included “WWG1WGA (unity).”¹²⁷

Even as the media coverage of the #TakeTheOath video died down, Jack Flynn continued making favorable tweets and asking questions about QAnon.

On August 23, 2020, Jack retweeted a message including #WWG1WGA.¹²⁸

On September 6, 2020, Jack made a rare inquiry asking for more information about the movement, asking “Please send me information explaining Q’ origins [sic]. Would like to truly understand more about this. Clarity matters. Thank you.”¹²⁹

On October 23, 2020, Jack directly shared a Q drop, retweeting a post from @wwg1wga74768620, featuring a screen shot of Q drop #1440, which features the text:

BOOM.
BOOM.
BOOM.

¹²³ Ibid.

¹²⁴ Ibid.

¹²⁵ Ex. 63 (<https://web.archive.org/web/20200822195318/https://twitter.com/gojackflynn>).

¹²⁶ Ibid.

¹²⁷ Ibid.

¹²⁸ Ex. 64 (<https://web.archive.org/web/20200823124446/https://twitter.com/gojackflynn>).

¹²⁹ Ex. 79 (<https://web.archive.org/web/20200906231309/https://twitter.com/GoJackFlynn/>).

BOOM.
 A WEEK TO REMEMBER.
 DARK TO LIGHT.
 BLACKOUT NECESSARY.
 Q¹³⁰

On October 30, 2020, Flynn shared a tweet that read “Hooah, I Count the Flynn's among my Friends and Family, of Digital Soldier's WWG1WGA.”¹³¹

After Trump lost the election, Jack Flynn fully embraced the idea that Joe Biden’s victory was a fraud, and continued retweeting both election fraud conspiracy theories and QAnon memes. On December 22, 2020, Jack retweeted a stolen election post that included the hashtag “#WWG1WGAWORLDWIDE.”¹³²

The next day, Jack Flynn retweeted yet another mention of WWG1WGA, in a tweet from @RampTheresa advertising QAnon merchandise sold by The Shirt Show, the clothing website General Flynn had partnered with to raise money for his legal defense fund.¹³³

On December 26, 2020, he retweeted both an ad for an “#IStandWithFlynn” shirt including #WWG1WGA and two messages from @TheTrumpress featuring the same “#WWG1WGAWORLDWIDE” tag.¹³⁴

These were the last archived posts of Jack Flynn endorsing Q, and he does not appear to have tweeted about QAnon at all with his new account, @GoJackFlynn1.

Leslie Flynn is less active on social media, but has liked tweets featuring #WWG1WGA multiple times before the “take the oath” video was filmed. These likes include:

- A tweet with the language: “Pleasure to meet you, Leslie, and to follow MAGA. #WWG1WGA, #InItTogether.”¹³⁵
- A tweet reading in part: “@PandaTribune, @TruthSe33329977, @GenFlynn. Now that #GeneralFlynn is back we the people need to know what really happened in #ObamaGate, #WWG1WGA.”¹³⁶
- A tweet with the language “Fantastic! You've been Q'd for this one.” #ObamaGate, #WhereWeGo -- #WWG1WGA, #InItTogether, #WWG1WGAWorldwide, @TheGreatAwakening, #Q, #WeAreTheNewsNow, #EnjoyTheShow, #Phase3Justice”.¹³⁷

¹³⁰ Ex. 75 (<https://archive.ph/Wkq0b#selection-6635.0-6637.15>). Many Q believers claim that the position of the text in that drop is meant to invoke the image of a gun turned upside down – a hidden reference to violence. Ex. 1 (Pedersen Depo. Tr. 66:16-67:8).

¹³¹ Ex. 76 (<https://web.archive.org/web/20201109124921/https://twitter.com/gojackflynn>).

¹³² Ex. 68 (<https://web.archive.org/web/20201222195944/https://twitter.com/gojackflynn>).

¹³³ Ex. 11 (PX_200).

¹³⁴ Ex. 69 (<https://web.archive.org/web/20201226032708/https://twitter.com/gojackflynn>).

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- A tweet that included the WWG1WGA phrase misspelled: “@PandaTribune, @GoJackFlynn, @GenFlynn, #WELCOMEBACKGENERALFLYNN, #WETHEPEOPLE, #GODBLESTHEUNITEDSTATESOFAMERICA, #WWG1WGAWW.”¹³⁸
- A tweet to CBS reporter Catherine Herridge reading, “@CBS_Herridge, @SenRonJohnson, @CBSNews. Congratulations, Catherine. You have been Q'd. Change we can believe in. Q. #WWG1WGA, #WakeUpAmericas, #TheGreatAwakening, #QAnon, #DigitalSoldiers, #WeAreTheRevolution, #BeReady, #RedPilled, #WeAreInThisTogether.”¹³⁹
- A tweet sent to multiple members of her family reading, “Take the oath, General Flynn. It's really the American public that has to continue to step up. If you want to breathe the fresh air of liberty, you have to fight. You have to sacrifice. You have to have the courage and resolve to do that. #WWG1WGA.”¹⁴⁰

And in her deposition, she clearly indicates that far from having no familiarity with the slogan, she “may have seen it” before speaking it for the first time on July 4, 2020.¹⁴¹

Taken altogether, Jack’s numerous mentions and Leslie’s admission to possibly having seen the phrase before the video was filmed paint the clear and unambiguous picture that Jack and Leslie Flynn:

- Knew what QAnon was, or at least wanted to know more about it
- Knew that “Where We Go One, We Go All” and its abbreviation “WWG1WGA” was connected to QAnon
- Had absolutely no issue with funding General Flynn’s legal defense through QAnon and would take donations from anyone who supported General Flynn, including QAnon followers
- Believed Q was a harmless movement of patriots doing research on the Constitution
- Defended the beliefs of those who were part of the QAnon movement as “no harm no foul” and patriotic
- Were proud of the exposure that the video of the Flynn family “taking the oath” received in the media

IX. CONCLUSION

Jack and Leslie Flynn claim that CNN had no basis to link them to QAnon. CNN did not say so. But, based on both my experience writing about the QAnon movement and Jack and Leslie’s extensive use of QAnon iconography, I believe that a reasonable journalist would have a reasonable basis to conclude that Jack and Leslie Flynn knew what the QAnon movement was and

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what “Where We Go One, We Go All” meant, and they knew how important Q was to General Flynn’s legal defense, and willingly associated with it to benefit General Flynn.

The Flynn family’s claims that Q is a “Nazi cult” that they would never have anything to do with are undercut by these facts. And the family’s claim that “Where We Go One, We Go All” is a “family motto” or “expression of patriotism” that they were not familiar with before the “take the oath” video are undercut by the phrase only being associated with QAnon, except for its brief use in a film released over 20 years before Q made the first posts on 4chan, and their own testimony that they had never used the phrase before July 4, 2020. [REDACTED]

Jack and Leslie Flynn’s statements of support for Q, and sharing of Q-related hashtags such as #WWG1WGA, #TakeTheOath, and #DigitalSoldiers were consistent with those of other publicly avowed QAnon believers. They made no effort to push back against the violent and undemocratic ideas that QAnon is built around until well after the Fourth of July “take the oath” video went viral – and have only targeted one outlet in their pushback, out of all of the various news sources that wrote about them as QAnon believers.

It is impossible to know with certainty whether Jack and Leslie Flynn *believe* QAnon is real. But their actions speak clearly. They knew what the QAnon movement was, wanted to appeal to Q believers for financial purposes, and had no trouble sharing their interest in Q with others – until the moment they did. By any reasonable definition, these are the hallmarks of QAnon followers.

Dated: June 5, 2023

A handwritten signature in black ink, appearing to read "Mike Rothschild", is written over a horizontal line.

Mike Rothschild